

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

CRISPINIANA DOMINGO

Plaintiff,

**VS.**

## JURY TRIAL DEMANDED

**JUSTIN WOODEN and  
MONIKA ANN MARTINEZ,  
University of Illinois at Chicago  
Police Department Officers, and  
ERICA WILLIAMS**

## Defendants.

## COMPLAINT

The Plaintiff, CRISPINIANA DOMINGO, complains against Defendant University of Illinois at Chicago Police Personnel JUSTIN WOODEN and MONIKA ANN MARTINEZ and against ERICA WILLIAMS, stating the following:

## Jurisdiction/Venue

1. The jurisdiction of this court is invoked pursuant to the Civil Rights Act, 42 U.S.C. § 1983, § 1988, the 28 U.S.C. 28 U.S.C. § 1331 and 28 U.S.C. § 1343(a); the Constitution of the United States, and pendent jurisdiction, as provided under 28 U.S.C. § 1367(a). Venue is proper as, upon information and belief, all of the Parties reside within the District and the events from which this claim arises all occurred within the District.

## Parties

2. The Plaintiff, at the time of these occurrences, was a resident of Bolingbrook,

Illinois, in Will County in the Northern District of Illinois.

3. Upon information and belief, at the time of these occurrences, Defendant WILLIAMS was a resident of Chicago, Illinois, in Cook County, in the Northern District of Illinois.
4. At the time of these occurrences, Defendants WOODEN and MARTINEZ were sworn police officers with the University of Illinois at Chicago Police Department, acting in the course and scope of their employment and under color of law.

### **Facts**

5. At the time of these occurrences the Plaintiff was employed as a registered nurse at the University of Illinois Hospital in Chicago, Illinois.
6. On July 5, 2016, the Plaintiff was arrested by Defendants Detective WOODEN and Detective MARTINEZ (jointly referred jointly to as the “Defendant Officers”) of the University of Illinois at Chicago Police Department.
7. The Plaintiff had broken no laws.
8. The Defendant Officers told the Plaintiff that she was being arrested for aggravated battery to a child, namely, the patient Austin Bush.
9. The Defendant Officers, acting maliciously, authored reports and statements that caused the Plaintiff to be prosecuted without probable cause, by the Cook County State’s Attorney’s Office, for several counts of aggravated battery to a child.
10. The Defendant Officers, in their reports, alleged that their investigation into

injuries sustained by Austin Bush was informed by statements made by Defendant WILLIAMS, a customer service representative employed by University of Illinois Hospital.

11. Defendant WILLIAMS, acting maliciously, falsely alleged that she, Defendant WILLIAMS, had observed the Plaintiff physically beat Austin Bush.
12. The Defendant Officers knew that Defendant WILLIAMS'S account was unbelievable based upon their investigation of the Austin Bush incident, and their knowledge of evidence contradicting WILLIAMS'S account, including but not limited to medical reports, DCFS reports, and video evidence.
13. The Defendant Officers, therefore, arrested the Plaintiff without probable cause or lawful justification.
14. As a result of her arrest and prosecution, the Plaintiff was in the Cook County Jail for approximately one week before being released on bond. She was suspended from her work as a nurse for nearly two years and suffered physical and emotional injuries including but not limited to fear, anxiety, depression, humiliation, and loss of sleep. She suffered pecuniary losses including but not limited to the costs of her legal defense, and damage to her professional reputation.
15. The Plaintiff was tried in the Circuit Court of Cook County and found not guilty, in a manner consistent with her innocence on or about February 26 of 2018.
16. The Plaintiff brings 42 U.S.C. § 1983 claims against Defendant WOODEN and

Defendant MARTINEZ for false arrest.

17. The Plaintiff brings a 42 U.S.C. § 1983 claim against Defendant WOODEN and Defendant MARTINEZ, respectively for failing to intervene to prevent the Plaintiff from being subjected to false arrest, despite the fact that each Defendant Officer had the means and opportunity to do so.
18. The Plaintiff brings a 42 U.S.C. § 1983 claim against Defendant WOODEN and Defendant MARTINEZ for unlawful pre-trial detention.
19. The Plaintiff brings a malicious prosecution claim against all Defendants WOODEN, MARTINEZ, and WILLIAMS.

Wherefore, for the reasons stated above, the Plaintiff seeks compensatory damages for her injuries and losses, as well as punitive damages and attorney's fees, and the costs of prosecuting this action, as well any further relief that this Court may deem just.

**PLAINTIFF DEMANDS A TRIAL BY JURY**

Date: July 5, 2018

s/Adrian Bleifuss Prados

Adrian Bleifuss Prados

One of the Attorneys for the Plaintiff  
DVORAK LAW OFFICES, LLC  
900 W. Jackson Suite 5W  
Chicago, Illinois 60607